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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

AARON SIEGEL, JASON COOK,
JOSEPH DELUCA, NICOLE
CUOZZO, TIMOTHY VARGA,
CHRISTOPHER STAMOS, KIM
HENRY, AND ASSOCIATION OF
NEW JERSEY RIFLE AND PISTOL
CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his
official capacity as Attorney General of
the State of New Jersey, PATRICK J.
CALLAHAN, in his official capacity
as Superintendent of the New Jersey
Division of State Police,

Defendants.

Hon. Karen M. Williams, U.S.D.J.
Hon. Ann Marie Donio, U.S.M.J.

Docket No. 22-CV-7463

**ATTORNEY DECLARATION OF
ANGELA CAI IN SUPPORT OF
MOTION TO FILE AN
OVERLENGTH BRIEF**

I, ANGELA CAI, of full age, hereby declare as follows:

1. I am employed as Deputy Solicitor General by the State of New Jersey, Department of Law and Public Safety. I provide this Declaration in support of Defendants' Opposition to Plaintiffs' Motion for a Temporary Restraining Order. I submit this declaration in support of Defendants' motion to file a brief 10 pages over the 40 page limit of L. Civ. R. 7.2(b).

2. This matter concerns sweeping constitutional challenges to a newly enacted firearms statute. Plaintiffs' six-count Complaint touches nearly numerous aspect of the newly enacted P.L. 2022 Chapter 131. It further challenges provisions of New Jersey law that predate the new legislative enactment.

3. Plaintiffs previously filed a Motion for Leave to File Excess Pages for their brief in support of their motion for emergency relief. *See* Dkt. 9. On December 28, 2022, this Court granted Plaintiffs' Motion for Leave to File Excess Pages. *See* Dkt. 12.

4. To conduct the historical inquiry under *New York State Rifle & Pistol Ass'n, Inc. v. Bruen*, 142 S. Ct. 2111 (2022), the State must identify and discuss historical evidence in its brief, which requires a significant portion of space.

5. As a result, despite diligent effort, it is not possible to comply with the 40 page limit and also to respond to each of the claims raised by Plaintiffs in their Motion for a Temporary Restraining Order.

6. As such, Defendants respectfully request that the Court grant leave for Defendants to file a 50 page brief in opposition to Plaintiffs' Motion for a Temporary Restraining Order.

I declare that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By: /s/ Angela Cai
Angela Cai
Deputy Solicitor General

December 30, 2022